IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTIRCT OF VIRGINIA Alexandria Division

NORMAN BRADFORD,)
Plaintiff,)
v.) Civil Action No. 1:09-CV-1226
)
HSBC MORTGAGE)
CORPORATION, et al.,)
Defendants.)
)

NOTICE OF INTENT TO FILE NOTICE OF HEARING

PLEASE TAKE NOTICE THAT, as soon as an agreeable date is reached with opposing counsel, Counsel for Defendant Professional Foreclosure Corporation of Virginia, ("PFC") intends to file a Notice of Hearing on its filed 12(b)(6) Motion for Failure to State a Claim Upon Which Relief Can Be Granted as to Plaintiff's Amended Complaint.

Respectfully Submitted,

PROFESSIONAL FORECLOSURE CORPORATION OF VIRGINIA, and SHAPIRO & BURSON, LLP,

By Counsel

/s/ Joseph J. Shannon
Joseph J. Shannon, Esquire

VSB No. 75628

Counsel for Professional Foreclosure Corporation of Virginia

SHAPIRO & BURSON, LLP

13531 Lee Jackson Memorial Hwy.

Suite 201

Fairfax, VA 22033

Phone: (703) 261-7461 Fax: (703) 449-5850 Email: jshannon@logs.com

CERTIFICATE OF SERVICE

I hereby certify that on August 18, 2010, a copy of the foregoing Motion to Dismiss and Memorandum of Points and Authorities in support thereof will be electronically filed with the Clerk of Court through the CM/ECF system, which will then notify the following of such filing:

Daniel M. Gray, VSB#39942 Law Offices of Daniel M. Gray, LLC 7617 Virginia Avenue Falls Church, VA 22043 Telephone: 703-204-0164

Fax: 703-204-1449

Email: graydm2@verizon.net

Counsel for Plaintiff

Richard B. Rogers Richard B. Rogers plc 6606 Thurlton Drive Alexandria, VA 22315 Telephone: 571-969-1727

Email: richard b rogers@msn.com

Counsel for Plaintiff

Robert Ryan Michael Bierman Geesing & Ward LLC (Richmond) 8100 Three Chopt Rd Room 240 Richmond, VA 23229-4833 804-282-0463 804-282-0541 (fax)

/s/ Joseph J. Shannon

Joseph J. Shannon, Esquire VSB No. 75628 Counsel for Professional Foreclosure Corporation of Virginia SHAPIRO & BURSON, LLP 13531 Lee Jackson Memorial Hwy. Suite 201 Fairfax, VA 22033

Phone: (703) 261-7461

Fax: (703) 449-5850 Email: <u>jshannon@logs.com</u>